

Illinois Environmental Protection Agency  
Bureau of Air, Permit Section  
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Project Summary  
Federally Enforceable State Operating Permit(FESOP)  
RockTenn CP, LLC  
New Lenox, Will County

Site Identification No.: 197070AAW  
Application No.: 09030061

Schedule

Public Comment Period Begins: April 30, 2014  
Public Comment Period Closes: May 30, 2014

Illinois EPA Contacts

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## **I. INTRODUCTION**

RockTenn CP, LLC has applied for a Federally Enforceable State Operating Permit (FESOP) for its manufacturing facility at 2251 Berens Drive in New Lenox. This facility requires an air pollution control operating permit because it is a source of emissions. The Illinois EPA has prepared a draft of the permit that it would propose to issue for the plant. However, before issuing the permit, the Illinois EPA is holding a public comment period to receive comments on this proposed action and the terms and conditions of the draft permit that it would propose to issue.

## **II. SOURCE DESCRIPTION**

RockTenn CP, LLC operates a corrugated container manufacturing facility. The corrugating line produces sheets of corrugated stock, which are produced by bonding rolls of paperboard (manufactured at other locations) with a starch based adhesive. Paper rolls are fed into the steam assisted corrugator, which initially creates the accordion-like inside for the cardboard. The starch adhesive is applied to the grooves so the top and bottom cardboard sheets will stick to the accordion-like inside.

The corrugated sheets from the corrugating line are transferred to the converting area within the plant where they are converted into boxes per customer specifications by cutting, scoring and applications of inks and adhesives on one of the lines.

The major air pollutant of concern at this facility is volatile organic material (VOM). The largest source of VOM at this facility is the inks, adhesives and solvents. VOM is contained in these materials. The VOM is evaporated into the atmosphere when these materials are used.

The fuel combustion equipment combusts natural gas. Nitrogen oxides are emitted from the fuel combustion equipment. Nitrogen oxides are formed thermally by a combination of oxygen and nitrogen in the air at the temperatures at which fuel is burned. Thermal nitrogen oxides formed during the operation of all common high temperature combustion processes.

Carbon monoxide is also emitted from the fuel combustion equipment. It is formed by the incomplete combustion of fuel. Carbon monoxide is associated with most combustion processes and is found in measurable amounts in the exhausts of fuel combustion equipment. Other contaminants formed by the combustion of natural gas are particulate matter and VOM. These air pollutants are emitted in smaller amounts than nitrogen oxides and carbon monoxide.

### **III. GENERAL DISCUSSION**

Federally Enforceable State Operating Permits (FESOPs) are federally enforceable, that is, the terms and conditions of the permits can be enforced by USEPA under federal law, as well as by Illinois government and the public under state law. These permits can establish federally enforceable limitations on the operation and emissions of a source that restrict the potential emissions of the source.

The source has applied for a FESOP because the actual emissions of the plant are below the levels at which the plant would be considered a major source under Title V of the federal Clean Air Act. However, in the absence of federally enforceable limitations, the plant's potential emissions would be such that the plant would be considered a major source. The permit acts to restrict the plant potential emissions so that it need not be considered a major source. As a result, the source does not need to obtain a Clean Air Act Permit Program (CAAPP) permit for the plant, as would otherwise be required.

The FESOP limits the operation and annual emissions of the plant to below the major-source-thresholds of 100 tons for VOM, 10 tons for an individual HAP and 25 tons for combined HAPs.

### **IV. APPLICABLE EMISSION STANDARDS**

All emission units in Illinois must comply with state emission standards adopted by the Illinois Pollution Control Board. These emission standards represent the basic requirements for sources in Illinois. The Board has specific standards for units emitting volatile organic material in the Greater Chicago Area. This source is performing flexographic printing. Flexographic printing is subject to 35 Ill. Adm. Code 218.401 which requires coatings and inks to contain no more than forty percent VOM by volume of the coating and ink. The application shows that the plant is in compliance with applicable state and federal emission standards.

### **V. CONTENTS OF THE PERMIT**

The permit that the Illinois EPA is proposing to issue will identify the specific emission standards that apply to the emission units at the plant. The conditions of this permit are intended to ensure that the source continues to comply with applicable emission standards.

The permit would also contain limitations and requirements to assure that this plant is operated as a non-major source. The permit would limit the operation and annual emissions of the plant to below the major-source-thresholds of 100 tons for VOM, 10 tons for an individual HAP and 25 tons for combined HAPs. (Annual emissions of other pollutants from the plant are well below the 100 ton major source threshold.)

The permit would also set limitations on the amount of VOM used in the coatings and solvents. These limitations are consistent with the historical operation of emission units at the plant.

The permit conditions would also require appropriate compliance procedures, including inspection practices as well as recordkeeping and reporting requirements. The source must carry out these procedures on an on-going basis to demonstrate that the plant is being operated within the limitations set by the permit and that the plant's emissions are being properly controlled.

## **VI. REQUEST FOR COMMENTS**

It is the Illinois EPA's preliminary determination that the source has met the requirements for issuance of its permit. The Illinois EPA is therefore proposing to issue the permit.

Comments are requested on this proposed action by the Illinois EPA and the proposed conditions on the draft permit. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 IAC Part 166.